

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Lead Case]
&
All Consolidated Cases

**LULAC PLAINTIFFS' MOTION FOR ENLARGEMENT OF TIME
TO FILE LULAC PLAINTIFFS' BRIEF REGARDING EVIDENCE
FROM THE TEXAS LEGISLATIVE COUNCIL**

Plaintiffs League of United Latin American Citizens, *et al.*, ("LULAC Plaintiffs") move the Court for an enlargement of time to file *nunc pro tunc* their Brief Regarding Evidence from the Texas Legislative Council. For the reasons set forth below, LULAC Plaintiffs request that the Court accept their Brief Regarding Evidence from the Texas Legislative Council, which was filed approximately 6 hours after the Court's deadline.

1. LULAC Plaintiffs timely filed their Chart of LULAC exhibits subject to objection by State Defendants before 5pm Mountain Time on June 17, 2025.
2. In order to complete their Brief Regarding Evidence from the Texas Legislative Council on the same day, LULAC Plaintiffs were required to re-review their exhibit list and the joint exhibit list, review correspondence among the parties leading up

to and during the trial, and create new exhibits in support of their arguments, including a new exhibit comparing their inventory of the joint exhibit list with the disputed LULAC exhibits.

3. LULAC Plaintiffs diligently completed these tasks before filing the brief, and respectfully submit that the additional tasks related to preparing the brief delayed the filing until later in the evening.
4. The circumstances surrounding LULAC Plaintiffs' delay support granting the extension, including their "good faith and the absence of any danger of prejudice to the debtor or of disruption to efficient judicial administration posed by the late filings. *Pioneer Inv. Services Co. v. Brunswick Associates Ltd. P'ship*, 507 U.S. 380, 397, (1993)
5. State Defendants are not prejudiced by the delayed filing of LULAC Plaintiffs' brief.
6. Given the relatively short and excusable delay in filing, and lack of prejudice to the other parties in this matter, LULAC Plaintiffs respectfully request that the Court grant an extension of time for the filing of their' Brief Regarding Evidence from the Texas Legislative Council.

CONCLUSION

For the reasons stated above, LULAC Plaintiffs respectfully request the Court grant their motion for extension of time to file.

Dated: June 17, 2025

Respectfully submitted,

/s/ Nina Perales
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**Admitted *pro hac vice*
Counsel for LULAC Plaintiffs*

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 17th day of June 2025.

/s/ Nina Perales
Nina Perales

CERTIFICATE OF CONFERENCE

The undersigned counsel conferred with counsel for Movants by email on the night of June 17, 2025 but did not receive a response before filing this motion.

/s/ Nina Perales
Nina Perales